Q. (Reference Application, 2.1 2025 Substation Refurbishment and 1 2 Modernization, Appendix A: Summerville Substation Refurbishment and 3 Modernization, page 8) It is stated "There are deficiencies identified with the 4 ground grid at SMV Substation that pose a risk to safety and reliability." 5 When did NP first become aware that there was a safety problem at this 6 substation that could result in electrocution? It is understood that there is a 7 similar safety issue at the SMV and LOK Substations. When did NP become 8 aware of the safety issues at these substations?

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10 A. In 2020, Newfoundland Power completed an engineering assessment of its substation ground grids. The assessment determined that 46 substations had deficiencies that needed to be addressed. In the Company's 2022 Capital Budget Application, a Substation Ground Grid Upgrades project was introduced to address these deficiencies. Through the Substation Ground Grid Upgrades projects and the Substation Refurbishment and Modernization projects, the substation ground grids will be upgraded in compliance with ANSI/IEEE Standard 80 Guide for Safety in AC Substation Grounding.